

EXHIBIT A

DECLARATION OF JAGMOHAN S. DHILLON

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**Attorney for Defendant
JAGMOHAN S. DHILLON**

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DISTRICT**

I, Jagmohan S. Dhillon, declare under penalty of perjury the following:

17 1. On February 25, 2011 I signed a plea agreement stating that on or about June
18 19, 2007 I agreed to knowingly transport approximately 45 kilograms of
19 cocaine to Canada after Jason Wei loaded the cocaine into my tractor trailer.
20 After Jason Wei loaded the cocaine into my tractor trailer I knowingly
21 transferred the cocaine to another individual to transport into Canada in
22 furtherance of the conspiracy.

23 2. On March 3, 2011 I pleaded guilty in open court to conspiracy to distribute and
24 possess with intent to distribute more than 5 kilograms of cocaine and I
25 admitted the foregoing factual basis.

26 3. On June 23, 2011 I told the very competent probation officer that I agreed with
27 my involvement with the conspiracy outlined in my plea agreement. I also told
28 the probation officer that I felt duped into committing the offense, that I needed

1 financing for my truck, that I drove to Los Angeles to pick up freight, part of
2 my delivery load appeared incorrect and I questioned it, that I still thought I was
3 transporting legitimate freight when Wei loaded the cocaine into my truck, that
4 I later determined that the packages Wei loaded onto my truck was narcotics
5 and that I was transporting narcotics, and that I continued to transport the
6 narcotics until I met up with and transferred the cocaine to another truck driver
7 who transported the cocaine into Canada. (See paragraph 29 of PSR). All of
8 the above is true.

9 4. I did not emigrate from India to Canada until November 3, 1997. This was the
10 first time I entered North America.

11 5. My chosen profession in Canada was a self-employed truck driver. I started
12 driving trucks in 1998. Around 2001, I owned an 18 wheeler. In 2006 my
13 partner crashed my truck and I broke my arm and I was out of work for three
14 months.

15 6. From December, 2006 to May of 2007 my arm and my truck were fixed so I was
16 able to continue working as a self-employed truck driver.

17 7. Because my family moved from Ontario, Canada to British Columbia, Canada,
18 I sold my 18 wheeler to Desert West Express in May of 2007.

19 8. On June 2nd or 3rd, 2007 I began working for Desert West Express in
20 Missasauga, Ontario, Canada as a long haul trucker driving their trucks. I made
21 a total of two trips. The first trip was to the Reno area and the Bay area to pick
22 up various loads at various locations. I returned with the loads on June 10,
23 2007. All the loads were legitimate because I had properly documented bills of
24 lading for each pick up.

25 9. On June 14th or 15th, 2007 I was sent by the owner and operators of Desert West
26 Express on another run in Southern California. During the trip I made four
27 legitimate pick ups. Two in Ontario, CA; one in Chino, CA; and one in San
28 Bernardino, CA. For each of these pickups I received all the proper

1 documentation and bills of lading.

2 10. While making the pickups in Southern California on June 19, 2007 I got a cell
3 phone call from Mr. Guramritpaul Sidhu a co-owner of Desert West and
4 RandhirCheema, a dispatcher, who told me to pick up an additional load from
5 Jason Wei in Carson and that the load was supposed to be 45 pieces of precious
6 metal. Sidhu and Cheema gave me reference number 41 for pick up and gave
7 me Jason Wei's phone number.

8 11. After getting the reference number and Wei's phone number I started calling
9 Wei as instructed by my office. Wei only had 33 pieces and would not have the
10 45 pieces until later so I continued with my pick ups in Ontario and Chino. For
11 which I receive proper documentation of bills of lading and custom invoice.
12 After completing my pick ups at Ontario and Chino I called Mr. Sidhu at Desert
13 West to confirm my 4 loads and he told me to call Jason Wei because he now
14 had a full load of 45 pieces in two cartons and that I will be provided with a bill
15 of lading and custom invoice the next day June 20, 2007.

16 12. After receiving instruction from my boss at Desert West I made calls to Wei to
17 meet in an area in an industrial area around the intersection of the 605 and 10
18 freeways.

19 13. After the Wei pickup, I made one more pick up of a big machine in San
20 Bernardino and continued heading back to Canada via Niagra Falls.

21 14. During my drive back to Niagra Falls I made many calls to Desert West asking
22 for the paperwork for Wei's load and I never got any. I became suspicious and
23 they eventually told me the load was illegal.

24 15. When I told them I was going to refuse to drive the load any further they
25 threatened me and told me I had no right to remove it because the illegal load
26 belonged to someone else.

27 16. When I continued to refuse to drive the illegal load, they promised me that if I
28 didn't want to drive the illegal load they would have another trucker meet me

1 toward Canada until I met another trucker at a truck stop in the area of [REDACTED]
2 *[REDACTED] Fort Erie, Pa*

3 17. The truck that pulled up next to me was a black Peterbilt with an empty flat bed
4 trailer from JAS Transport Limited unit #902. The driver took the two cartons
5 from me and loaded them into his truck and drove away. I never saw the truck,
6 trailer or the driver again. *Fort Erie, Pa*

7 18. I slept that night at the truck stop at [REDACTED] and on June 22, 2007
8 continued to Canada. I arrived at the Niagra Falls border crossing at 7:45 p.m.
9 on June 22, 2007 where the tractor trailer was searched before allowing me to
10 proceed at 2:00 a.m. on June 23, 2007.

11 19. When I returned to Desert West on June 23, 2007 I told them I was quitting and
12 would no longer work for them. I moved from Ontario, Canada to British
13 Columbia on June 26, 2007 to be with my family.

14 20. Since July, 2007 to July, 2009 when I was arrested and jailed I have lived in
15 British Columbia working as a truck driver or a taxi cab driver. Since my
16 involvement with cocaine from June 19, 2007 to June 22, 2007 I have never had
17 any involvement or connection with illegal drugs.

18 Dated: *AUGUST 5, 2011*



19 **JAGMOHAN S. DHILLON**

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